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Attorneys for Plaintiffs *Liberty Mutual Fire Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

AIG SPECIALTY INSURANCE COMPANY  
F/K/A CHARTIS SPECIALTY INSURANCE  
COMPANY AND ALSO AMERICAN  
INTERNATIONAL SPECIALTY LINES  
INSURANCE COMPANY, an Illinois  
Corporation;

Plaintiffs,

vs.

LIBERTY MUTUAL FIRE INSURANCE  
COMPANY, a Massachusetts Corporation; and  
DOES 1 through 100, inclusive,

Defendants.

Case No.: 2:17-cv-01260-APG-NJK

**STIPULATION AND ORDER  
EXTENDING TIME FOR BRIEFING ON  
PLAINTIFF'S MOTION TO STAY  
DISCOVERY [ECF NO. 74]**

**(FIRST REQUEST)**

Plaintiff, AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS SPECIALTY INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY ("Plaintiff"), and Defendant, LIBERTY MUTUAL FIRE INSURANCE COMPANY ("Defendant" and collectively, with Plaintiff the "Parties"), by and through their respective counsel of record, and pursuant to Local Rules 6-1(a) and 6-2, and Federal Rule of Civil Procedure Rule 6, hereby stipulate and agree as follows:

WHEREAS, on October 25, 2017, the Parties filed a joint discovery plan on October 25, 2017 (ECF No. 71);

WHEREAS, on October 25, 2017, this Court denied the Parties' discovery plan and ordered Plaintiff to file, within 14 days of the order, a motion to stay discovery addressing the pertinent standards (ECF No. 72);

1 WHEREAS, on November 9, 2017, Plaintiff filed a Motion to Stay Discovery (ECF No. 74);  
2 WHEREAS, Defendant's Opposition to Plaintiff's Motion to Stay Discovery, if any, is  
3 currently due November 27, 2017;

4 WHEREAS, Plaintiff's Reply in Support of its Motion to Stay Discovery, if any, is due  
5 December 4, 2017;

6 WHEREAS, Plaintiff and Defendant have been in discussion concerning a possible limited  
7 stipulation as to a stay of discovery in this matter. Consequently, an additional one (1) day extension  
8 would allow the Parties to continue these meaningful discussions which may relieve this Court of the  
9 burden of having to consider additional briefing; and

10 WHEREAS, Fed.R.Civ.P. 6(b) requires the Court to approve an extension of time, and  
11 therefore the Parties collectively request the Court approve the stipulation, as set forth below:

- 12 a. This is the Parties' first stipulation for an enlargement of time;  
13 b. The Parties stipulate and agree that the deadline for Defendant to file a Response to  
14 Plaintiff's Motion to Stay shall be extended to **November 28, 2017** and Plaintiff's deadline to file a  
15 Reply in Support shall be extended to **December 5, 2017**; and  
16 c. This stipulation is not made for purposes of delay.

17 IT IS SO STIPULATED.

18 **DUANE MORRIS LLP**

**HEROLD & SAGER**

19 By: /s/ Daniel B. Heidtke  
20 Dominica C. Anderson (SBN 2988)  
21 Daniel B. Heidtke (SBN 12975)

22 *Attorneys for Defendant Liberty Mutual Fire*  
23 *Insurance Company*

By: /s/ Joshua A. Zlotlow  
Andrew D. Herold (SBN 7378)  
Joshua A. Zlotlow (SBN 11333)  
*Attorneys for Plaintiff AIG Specialty Insurance*  
*Co. f/k/a Chartis Specialty Insurance Co. and*  
*also American International Specialty Lines*  
*Insurance Co.*

24 **IT IS SO ORDERED** Dated: November 28, 2017.  
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United States Magistrate Judge